

MEMO ENDORSED

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December 13, 2019

Via ECF

Hon. Judge Andrew L. Carter
U.S. District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Jacqueline Gray v. Mid-Bronx CCRP Early Childhood Center, Inc. et al
Index No. 18-CV-7934 (ALC) (OTW)

Dear Hon. Judge Carter:

This office is co-counsel in our representation of Defendants in the above referenced matter, and I write to respectfully request an extension of the deadline to submit a settlement agreement and motion for court approval pursuant to *Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 199 (2d Cir. 2015). Counsel for the parties are still in the process of finalizing a written settlement agreement. We have encountered an unanticipated problem with respect to one of the primary terms of our agreement to resolve this case. However, the parties are working diligently and cooperatively to address and hopefully resolve the problem.

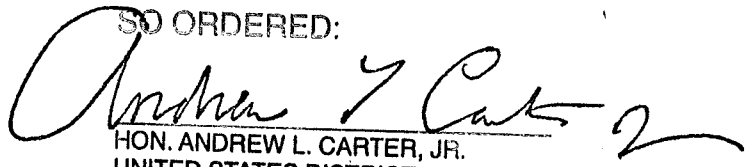
Given the foregoing, we respectfully request an additional two-week extension of the current deadline, which is today. If granted, the new deadline for submission of the settlement agreement would be December 27, 2019. This is the second request for an extension. I have conferred with counsel for Plaintiff, and he consents to this request. Should the court grant the parties' request, no other future deadlines would be affected.

Thank you for your time and consideration regarding this matter.

Very truly yours,

/s/
Joshua Beldner

CC: VIA ECF
Counsel for all parties

SO ORDERED:

HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE
12/16/19